UNITED STATES DISTRICT CO SOUTHERN DISTRICT OF NEW			
JON R. MORGAN,		X : :	1:19-cv-10911-GBD
	Plaintiff,	:	NOTICE OF SETTLEMENT
-against-		:	NOTICE OF BETTERMENT
UNIQUE USA, INC.,		:	
		:	
	Defendants.	: v	

Now comes Plaintiff and Defendant, by and through their respective counsel, to provide notice to the Court that the present case has been settled in principle between Plaintiff and Defendant and state:

- 1. A Settlement Agreement ("Agreement") is in the process of being finalized amongst the parties. Once the Agreement is fully executed, and Plaintiff has received the consideration required pursuant to the Agreement, the parties will submit a Stipulation of Dismissal with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and will therein request that the case be dismissed and closed.
- 2. The parties respectfully request that the Court stays this case and adjourns all deadlines and conferences.
- 3. We respectfully request the Court provide that the parties may seek to reopen the matter for forty-five (45) days to assure that the parties have complied with their obligations under the Agreement.

Dated: October 29, 2020

SHALOM LAW, PLLC

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

____/s/Jonathan Shalom____

Jonathan Shalom 105-13 Metropolitan Avenue Forest Hills, NY 11375 Phone: (718) 971-9474 Attorneys for Plaintiff /s/ Sean J. Kirby_____

Sean J. Kirby 30 Rockefeller Plaza New York, NY 10112 Phone: (212) 653-8700 Attorneys for Defendant